



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

June 25, 2008

Reply To: ECL-115

Mr. James M. Anderson
DEQ Northwest Region
Portland Harbor Section
2020 SW Fourth Ave, Suite 400
Portland, OR 97201

RE: GASCO Vibration Analysis

Dear Mr. Anderson:

EPA is aware that NW Natural and Siltronic Corporation are currently conducting negotiations for NW Natural to conduct a vibration analysis of wall technologies that were presented in the *GASCO Groundwater/DNAPL Source Control Focused Feasibility Study*, November 2007 (the "FFS"). EPA commented on this document and stated that the barrier wall as presented in the FFS is too limited in depth and lateral extent. The FFS considered sheet pile wall and slurry wall, but did not consider other types of walls (e.g., secant wall), which EPA believes would allow placement of a deeper wall enable NW Natural to adequately control the upland groundwater plumes.

We are concerned that our comments are not being considered in the source control design and that other wall technologies are not being explored by NW Natural. Since we have not had an opportunity to view the vibration study being proposed, we are recommending that the vibration analysis be postponed until after EPA has had an opportunity to comment on the design. This would ensure that the appropriate vibration analysis is conducted one time without additional resources expended by both companies.

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-7216.

Sincerely,

A handwritten signature in cursive script that reads "Deb Yamamoto".

Deb Yamamoto, Unit Manager
Site Cleanup Unit #2
Office of Environmental Cleanup

cc: Bob Wyatt, NW Natural
Chip Humphrey, EPA-OOO
Dana Bayuk, ODEQ-NW
Eric Blischke, EPA-OOO
Kristine Koch, EPA-ECL
Lori Cora, EPA-ORC
Rene Fuentes, EPA-OEA
Sean Sheldrake, EPA-ECL
Tom, McCue, Siltronic Corporation